



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
CHATTANOOGA ENVIRONMENTAL FIELD OFFICE  
540 McCALLIE AVENUE, SUITE 550  
CHATTANOOGA, TENNESSEE 37402-2013  
(615) 634-5745 FAX (615) 634-6389

April 29, 1997

Certified Return Receipt

Mr. Jimmy C Thurman  
Harrington and King South, Inc.  
3939 Michigan Avenue  
Cleveland, TN 37312

Re: NOTICE OF VIOLATION (NOV) under  
the Tennessee Hazardous Waste Management Act  
T.C.A. 68-212-101 et. seq.  
Harrington and King South, Inc.  
TND # 98-213-9230  
File # 06-91

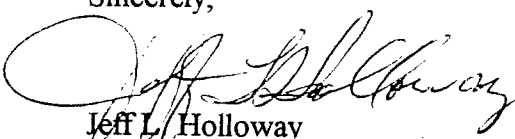
Dear Mr. Thurman:

On December 19, 1996, a hazardous waste Compliance Evaluation Inspection (CEI) was conducted at Harrington and King South, Inc. on Michigan Avenue. As a result of the inspection, Harrington and King South, Inc. was found in violation of the Tennessee Hazardous Waste Management Act, T.C.A. 68-212-101, et. seq. Please review the attached Inspection Report for details on the inspection findings, violations, and required actions. A compliance date of May 15, 1997 has been set for correction of the violations. A follow-up inspection will be performed after this date. Please be advised that T.C.A. 68-212-114 of the Tennessee Hazardous Waste Management Act states in part that:

Any person who violates or fails to comply with any provision of this part, any order of the Board or Commissioner, the terms or conditions of any permit issued or any rule, regulation, or standard adopted pursuant to this part shall be subject to a civil penalty of up to fifty-thousand dollars (\$50,000) per day of violation.

After reviewing this report, should you have any questions or need clarification, please feel free to contact me at (423) 634-5762.

Sincerely,

  
Jeff L. Holloway  
Environmental Specialist  
Division of Solid Waste Management  
Chattanooga Field Office

JLH: 96\harrking

cc: Audrey Baker, DSWM Enforcement Section, Nashville  
Jeaneanne Gettle, EPA, Region IV  
DSWM Central File, TND 98-213-9230  
Ed King, DSWM, Nashville

## Inspection Report

1. Site/Operation Inspected:

Harrington and King South, Inc.  
3939 Michigan Avenue  
Cleveland, TN  
TND 98-213-9230  
Bradley County

2. Primary Contact:

Mr. Jimmy C. Thurman, Vice President and General Manager  
Harrington and King South, Inc.  
3939 Michigan Avenue  
Cleveland, TN  
(423) 479-8691 or (800) 251-6026

3. Date and Time of Inspection:

December 19, 1996  
1:00 p.m. - 3:15 p.m.

4. Report Prepared By:

Jeff Holloway, Environmental Specialist IV  
Tennessee Department of Environment and Conservation  
Division of Solid Waste Management  
Suite 550  
540 McCallie Avenue  
Chattanooga, Tennessee 37402  
(423) 634-5762

5. Purpose of Inspection:

To evaluate Harrington and King South, Inc.'s compliance with the Rules Governing Hazardous Waste Management in Tennessee, Rule 1200-1-11, et seq.

6. Names and Affiliations of Other Inspection Participants:

Janice T. Horn, Division of Solid Waste Management, Chattanooga  
Jimmy C. Thurman, General Manager, Chattanooga Printing and Engraving  
Jeff Hammond, Maintenance Supervisor, Chattanooga Printing and Engraving

7. Facility Description:

Nature of Business:

Facility performs custom perforations in various types of sheet metal (stainless steel, brass, aluminum, etc.) for use as filters, door panels, heat shields, furniture, etc. Perforating operations are performed on large hole-punch presses. During perforation, 20-80% of metal is punched from the sheet. These metal punches are recycled by Southern Foundry Supply.

Types and Amounts of Wastes Generated:

Non-Hazardous Wastes:

- (1) Used shop rags and gloves - Rags are picked up and laundered by Cintas Uniform of Chattanooga; gloves are laundered by National Uniform.

Hazardous Wastes:

- (1) Petroleum Naptha from parts cleaning operation. Used in one 20-gallon industrial parts washer. Hazardous for ignitability. Waste generation rate to be determined. Facility has notified on this waste stream, but not as a separate waste stream. Facility previously notified on the mixture of petroleum naptha and mineral spirits as one waste stream. The facility will now notify on this as a separate waste stream. Waste is mixed with used oil for recycling. Analytical results show mixture has a flash point of  $>140^{\circ}$  F. Picked up by Jack Goins Waste Oil of Cleveland.
- (2) Mineral spirits - used as solvent/cleaner in press baths to remove some oils from metals. "Dirty" solvent is skimmed from the bath as needed, and mixed with Used Oil for recycling. Analytical results show mixture has a flash point of  $>140^{\circ}$  F. Waste solvent is hazardous for ignitability. Bath does not generate any sludge. Plant uses approximately 300 gallons of mineral spirits per month. Facility has notified on this waste stream, but not as a separate waste stream. Facility previously notified on the mixture of petroleum naptha and mineral spirits as one waste stream. The facility will now notify on this as a separate waste stream. Used Oil/mineral spirits picked up by Jack Goins Waste Oil of Cleveland, approximately once per month.

Recycled Materials:

- (1) Metals - from hole punching operations. Placed in 55-gallon drums. Picked up by Southern Foundry Supply.
- (2) Used Oil - lubricants, and oils drained from maintenance/cleaning of equipment and machinery. Stored in 450-gallon vertical tank in southwest corner, labeled "Waste Oil". Labeling cited as violation. Tank contains mixture of oils, petroleum naptha, and mineral spirits. Used Oil mixture picked up by Jack Goins Waste Oil of Cleveland approximately once per month.

Inspection Status:

- 1) Small Quantity Generator of Hazardous waste.
- 2) Used Oil Generator.

8. Inspection Findings:

Die Shop:

Build dies to make the perforations in the metal. Also perform surface grinding. Grinders use coolant which becomes mixed with oil. Oil is skimmed off and recycled; coolant is never changed. Scrap metals from this area go into a hopper for recycling. Mineral spirits used for cleaning parts on equipment. Gloves used in area are laundered by National Uniform.

Die Service Area:

Repair and maintenance service of dies for re-use. Area also has a die cleaner unit; oil is skimmed from coolant and recycled. Facility uses Tech Cool 3500 as coolant.

Press Department:

Area for performing perforations in metal sheets. Large sheets of metal are fed across plates on the presses; large hydraulic punches perforate the metal sheets as they are fed through the presses.

- 1) Near air compressor - two (2) 5-gallon buckets of used oil which had been drained from air compressor during repairs. One container approx. two-thirds (2/3) full, the other approx. one-quarter (1/4) full. No label on either container. Cited as labeling violation.
- 2) In southeast corner, near Solnen Press, one (1) 55-gallon container attached to a "pig squeegee", a device for squeezing oil from absorbent mats. Container was approx. one-half (1/2) full. Container was not labeled "Used Oil", and was cited as a violation.
- 3) In southwest corner, one 450-gallon vertical tank for storage of used oil/mineral spirit/petroleum naphtha mixture, labeled "Waste Oil". Cited as labeling violation. Concrete secondary containment in place around tank. Used oil picked up by Jack Goins Waste Oil of Cleveland approx. once per month.
- 4) Press #9 - Press with mineral spirits bath, used to remove oils from metals. Waste mineral spirits are skimmed from press, along with a small amount of oil from operation, and placed in "Used Oil" tank.
- 5) Press #4 - Same as Press #9, above.
- 6) CleanoMat Machine - located near vertical oil storage tank. Used for cleaning oil from finished metal sheets. Uses hot water only for wash (300 gallon capacity). When "dirty", oil is skimmed from wash water, which is non-hazardous. Oil from unit is placed into storage tank, and water is emptied to Cleveland City sewer (approximately once per month). Machine was not totally set up at time of inspection; awaiting parts.

Finishing Department:

Area for cutting and finishing of final product. Also houses Quality Assurance section.

Inspection findings (cont'd):

Shipping Area:

Finished products shipped out.

Maintenance Department:

Area for performing maintenance on plant equipment. Area contains one 20-gallon parts washer. Mineral spirits solvent used. Changed as needed, with waste solvent being placed with used oil. This is the only parts washer in the building.

Warehouse Department:

Used to store all stock and raw materials. Receive mineral spirits in 300-gallon totes; use approx. one (1) tote per month.

Loading Dock Area:

Area contained:

- (a) One roll-off box for collection of paper and scrap for recycling.
- (b) One truck trailer for storage of 55-gallon drums of scrap metal for recycling.
- (c) One spill pallet for draining oil from 55-gallon containers of scrap metal prior to placing containers in truck trailer. Oil from spill pallets poured into Used Oil storage tank inside building.

9. Violations:

Rule 1200-1-11-.11(1)(a)1 incorporates by reference **40 CFR 279.22(c)(1)**, "Labels", which states that "Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil"."

Violation:

- 1) The two 5-gallon containers used for collecting oil drained from the air compressor were not labeled with the words "Used Oil".
- 2) The 55-gallon container used for collecting oil squeezed from the absorbent mats (on the "pig squeegee"), was not labeled with the words "Used Oil".
- 3) The 450-gallon vertical tank utilized for storing used oil was not labeled with the words "Used Oil".

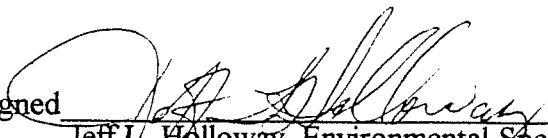
Required Action:

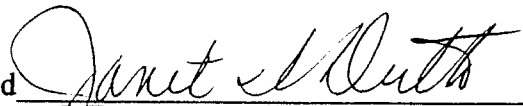
Containers must be labeled or marked clearly with the words "Used Oil". A compliance date of February 25, 1997 has been set for correction of the violations.

10. Comments:

Facility has notified on generation of waste streams for petroleum naptha and for mineral spirits, but notified as one combined waste stream. Facility must separate waste stream notifications of petroleum naptha and mineral spirits on annual reports. Waste stream generation amounts must be determined separately, and each waste stream amount counted toward facility's generator status. Need to be careful that the used oil/mineral spirits/petroleum naptha mixture does not fail the test for ignitability. If the flash point falls below 140° F, the mixture becomes hazardous waste for ignitability.

Thank you for your time and attention during our visit. The cooperation we received from you and your staff was greatly appreciated. If you have any questions regarding this report, please feel free to contact me at (423) 634-5762.

Signed  Date May 4, 1997  
Jeff L. Holloway, Environmental Specialist  
Division of Solid Waste Management

Reviewed  Date May 1, 1997  
Janet A. Dutto, Hazardous Waste Section Chief  
Division of Solid Waste Management

Reviewed  Date 04/01/97  
Guy M. Moose, Regional Director  
Division of Solid Waste Management